

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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AT 8:30
WILLIAM T. WALSH M
CLERK

IN RE VALEANT
PHARMACEUTICALS
INTERNATIONAL, INC.
SECURITIES LITIGATION

THIS DOCUMENT RELATES TO
ALL CASES

Master No.: 3:15-cv-07658-MAS-LHG

**JOINT STIPULATION AND
[PROPOSED] ORDER RE:
DISCOVERY AND SCHEDULE IN
SECURITIES CLASS ACTION
AND OPT-OUT LITIGATIONS**

WHEREAS, the Parties have conferred regarding discovery and the case schedule in the Class Action and Opt-Out Litigations, in light of developments in the Actions;

WHEREAS, the Parties have reached certain agreements memorialized below, but reserve all rights and arguments including, without limitation, concerning discovery, coordination, the stay, or the schedule in the Class Action and the Opt-Out Litigations; and

WHEREAS, the Parties have agreed to confer, subject to and without waiver of the reservation of rights set forth above, regarding the case schedule within five business days following the later of the Special Master's recommendations on: (1) the Motion for Judgment on the Pleadings by PricewaterhouseCoopers LLP ("PwC") in the Class Action (15-cv-07658); and (2) the Motion for Leave to Amend

Complaint by named plaintiff, the City of Tucson on behalf of the Tucson Supplemental Retirement System (“Tucson”) in the Class Action (15-cv-07658), hereafter, the “Meet-and-Confer Date”.

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, that:

(a) All discovery directed to PwC and Class Plaintiffs (Lead Plaintiff and Named Plaintiffs) in any capacity (as party or non-party), and their current or former partners, employees, officers, investment advisors, subadvisors, and directors, shall be stayed until the later of recommendations by the Special Master in the Class Action on: (1) PwC’s Motion for Judgment on the Pleadings; and (2) the Motion for Leave to Amend Complaint, and nothing in this stipulation shall be construed to suggest that such recommendations constitute final judicial decisions for purposes of determining whether the stay of discovery remains in effect by operation of law;

(b) Document discovery of all other Parties and non-parties to the Class Action and Opt-Out Litigations shall proceed;

(c) No depositions of any Parties to any of the Class Action or Opt-Out Litigations, including their current or former partners, employees, officers, investment advisors, subadvisors, and directors, shall be taken during the stay discussed in paragraph (a);

(d) Depositions of non-parties, other than non-parties covered by the stay discussed in paragraphs (a) and (c), may be taken during that stay;

(e) Nothing in this Stipulation and Proposed Order shall limit the ability of the Parties in the Opt-Out Litigations to seek documents from the Parties subject to the stay discussed in paragraph (a) after that stay is lifted;

(f) The Class Action and Opt-Out Litigations currently remain coordinated for pretrial purposes, and nothing in this Stipulation and Proposed Order is intended to modify the Court's October 12, 2018 coordination order or preclude the Parties from later seeking modification of that Order; and

(g) The following Amended Proposed Joint Discovery Plan, which modifies the schedule contained in Section IV of the Joint Discovery Plan (ECF No. 492), shall apply to the Class Action and the Opt-Out Litigations with the express understanding that the parties shall meet and confer by the Meet-and-Confer Date set forth above concerning discovery, coordination, the stay, class certification briefing and discovery, and the schedule in the Class Action and the Opt-Out Litigations:

Action	Proposed Dates
Deadline for substantial completion of any document productions in response to any requests for production served by November 15, 2019, with productions in response to those requests to be made on a rolling basis in advance of this date	May 6, 2020

Action	Proposed Dates
Deadline to meet and confer regarding protocol for depositions	May 6, 2020
Deadline for service of all interrogatories, requests for admission, and requests for production	December 21, 2020
Fact Discovery Cutoff	February 18, 2021
Deadline to serve affirmative expert reports	March 16, 2021
Deadline to serve rebuttal expert reports	May 14, 2021
Deadline to serve reply expert reports	June 11, 2021
Expert Discovery Cutoff	July 16, 2021
Deadline to file Dispositive Motion(s)	August 13, 2021
Deadline to file Opposition(s) to Dispositive Motion(s)	October 1, 2021
Deadline to file Reply in support of Dispositive Motion(s)	October 22, 2021
Deadline for objection(s) to proposed expert testimony under FRE 702	90 days before the final pretrial conference
Opposition to any objection(s) to proposed expert testimony under FRE 702	60 days before the final pretrial conference
Reply in support of any objection(s) to proposed expert testimony under FRE 702	30 days before the final pretrial conference
Deadline for parties to designate potential trial witnesses and proposed exhibits	45 days before the final pretrial conference
Deadline for parties to file a joint set of jury instructions, proposed jury instructions which are objected to by any other party and points and authorities in support of and in opposition to the objected to instructions	45 days before the final pretrial conference
Final Pretrial Conference	TBD

Action	Proposed Dates
Proposed Trial Date	TBD

DATED: March 18, 2020

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16-cv-07496, 16-cv-07497, 17-cv-06365,
17-cv-07625, 17-cv-07636, 17-cv-06513,
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17-cv-13488, 18-cv-00032, 18-cv-00089,
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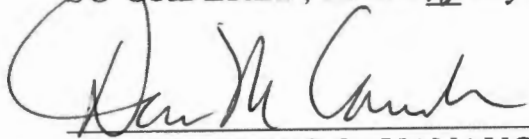
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SO ORDERED, on this 18 day of March, 2020.

A handwritten signature in black ink, appearing to read "Dennis Cavanaugh", written over a horizontal line.

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